



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: GS II
Facility Address: 200 Sierra Drive
Peachtree City, Georgia 30269 (Fayette County)
Mailing Address: 200 Sierra Drive
Peachtree City, Georgia 30269
Parent/Holding Company: Saint-Gobain
Facility AIRS Number: 04-13-113-00013

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:

Construction and Operation of a new roofing line, installation of a RTO for VOC/HAPs control, new storage tanks and vessels.

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division. The Division will issue a letter when this Operating Permit amendment is finalized.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Amendment and Permit No. **2952-113-0013-V-04-0**. Unless modified or revoked, this Amendment expires upon issuance of the next Part 70 Permit for this source. This Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in App No. **TV-609127** dated **November 23, 2021**; any other applications upon which this Amendment or Permit No. **2952-113-0013-V-04-0** are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **10** pages.



Richard E. Dunn, Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION**1.3 Process Description of Modification**

CertainTeed is proposing to construct a new roofing line as well as an associated regenerative thermal oxidizer (RTO) to provide additional Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) emissions control. Upon startup of the new line, CertainTeed will shut down the existing line.

New storage tanks and vessels are also proposed as part of this expansion. The production/throughput of asphalt shingles/roofing products will increase as part of the expansion.

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.1 Updated Emission Units

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
Granule and Sand System				
GRU, GTU	Granule Unloading	391-3-1-.02(2)(e)		
FSA, FSB	Filler Storage Silos	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	FSDC	Filler Storage Dust Collector
FCB	Filler Cold Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	CBDC	Cold Bin Dust Collector
FHB	Filler Hot Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	FHDC	Filler Heater Dust Collector
SB	Sand Application Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	RTO/RTOBP	RTO & Kimre Fume Collector
GS	Granule Silos (31)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)		
SSA	Sand Silo A	40 CFR 60 Subpart UU 391-3-1-.02(2)(e)	SSDC	Sand Silo Dust Collector
SSB	Sand Silo B			
SURF	Granule Application Area (surfacing)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	HEAF/RTO/RTOBP	High Efficiency Aerosol Filtration & RTO & Kimre Fume Collector
Storage Tanks				
CTA	Asphalt Coating Storage Tank 1 (48,000 gallons)	391-3-1-.02(2)(tt) 40 CFR 60 Subpart UU 391-3-1-.02(2)(vv)	RTO/RTOBP	RTO & Kimre Fume Collector
ST	Sealant Storage Tank (10,000 gallons)	391-3-1-.02(2)(tt) 40 CFR 60 Subpart UU 391-3-1-.02(2)(vv)	RTO/RTOBP	RTO & Kimre Fume Collector
SDT	Sealant Day Tank (300 gallons)	391-3-1-.02(2)(tt) 40 CFR 60 Subpart UU 391-3-1-.02(2)(vv)	RTO/RTOBP	RTO & Kimre Fume Collector
SLT	Seal/Lam Storage Tank			
SUT	Sealant Use Tank			
LT	Laminate Storage Tank	391-3-1-.02(2)(tt) 391-3-1-.02(2)(e) 391-3-1-.02(2)(vv)	RTO/RTOBP	RTO & Kimre Fume Collector
LDT	Laminate Day Tank	391-3-1-.02(2)(tt) 391-3-1-.02(2)(e)	RTO/RTOBP	RTO & Kimre Fume Collector
PCDT	Precoater Day Tank			
LUT	Laminate Use Tank			
LA	Laminate Applicator			
HOH1	Hot Oil Heater # 1 (16 MMBTU/hr)	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)		

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
HOH2	Hot Oil Heater # 2 (12 MMBTU/hr)			
EFP	Diesel Fire Pump	40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)		
IRB	IR Burner	391-3-1-.02(2)(g)	DMLDC	DML/IR Dust Collector
FHB	Filler Heater Burner (14 MMBTU/hr)	391-3-1-.02(2)(g)		
Coater				
FCHM	Horizontal Mixer	391-3-1-.02(2)(tt) 391-3-1-.02(2)(e)	RTO/RTOBP	RTO & Kimre Fume Collector
FCVM	Vertical Mixer			
FCC	Coater	391-3-1-.02(2)(tt) 40 CFR 60 Subpart UU 40 CFR 63 Subpart AAAAAAA	RTO/RTOBP	RTO & Kimre Fume Collector
SA	Sealant Applicator	391-3-1-.02(2)(tt) 391-3-1-.02(2)(e)	RTO/RTOBP	RTO & Kimre Fume Collector
COOL	Cooling Section	391-3-1-.02(2)(tt) 391-3-1-.02(2)(e)		
CTB	Asphalt Coating Storage Tank 2 (24,000 gallons)	391-3-1-.02(2)(tt) 40 CFR 60 Subpart UU 391-3-1-.02(2)(vv)	RTO/RTOBP	RTO & Kimre Fume Collector
CTC	Coating Storage Tank C	391-3-1-.02(2)(tt) 40 CFR 60 Subpart UU 391-3-1-.02(2)(vv)	RTO/RTOBP	RTO & Kimre Fume Collector
CU	Coating Unload	391-3-1-.02(2)(e)	-	-
SLU	Seal/Lam Unload	391-3-1-.02(2)(e)	-	-

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

Amended Conditions

3.2 Equipment Emission Caps and Operating Limits

- 3.2.3 The Permittee shall not concurrently withdraw or refill asphalt coating from both Asphalt Coating Storage Tanks (CTA) and (CTB) and shall be allowed to store asphalt coating in both tanks simultaneously.
[Avoidance of 40 CFR 52.21]

New Condition

- 3.2.4 The Permittee shall maintain the regenerative thermal oxidizer (ID No. RTO) at 1500 degrees Fahrenheit (1,500 °F) until the performance test required by Conditions 4.2.1 and 4.2.2 are completed. After the performance test, the Permittee shall operate RTO with the combustion zone temperature at or above the minimum temperature set point established during the most recent performance test.
[391-3-1-.02(6)(b)1(i)]
- 3.2.5 After startup and commencement of normal operations of the new asphalt roofing manufacturing line the Permittee shall decommission and retire the existing asphalt roofing manufacturing line within 15 days and notify EPD the decommissioning of all equipment in the existing asphalt roofing manufacturing line in writing within 15 days.
[Avoidance of 40 CFR 52.21]

3.3 Equipment Federal Rule StandardsAmended Condition

- 3.3.2 The Permittee shall comply with all applicable provisions of 40 CFR 63 Subpart AAAAAAA, *National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing*, for all subject equipment. In particular, for an asphalt processing operation and/or asphalt roofing manufacturing operation that is an area source of hazardous air pollutant (HAP) emissions which is subject to 40 CFR 63 Subpart AAAAAAA, the Permittee shall comply with the following for polycyclic aromatic hydrocarbons (PAH) or particulate matter (PM) emissions for each asphalt roofing manufacturing line, the Permittee shall meet the following emission limits as specified in Table 2 of 40 CFR 63 Subpart AAAAAAA:
[40 CFR 63.1-15, 63.11559, 63.11561 and 63.11566]

Emission Unit	Emission Limits
Coater-only production lines ~ Coater Emission ID (FCC)	a. Limit PAH emissions to 0.0002 lb/ton of asphalt roofing product manufactured; or
	b. Limit PM emissions to 0.06 lb/ton of asphalt roofing product manufactured.

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)**5.2 Specific Monitoring Requirements**Amended Conditions

- 5.2.1 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the temperature of the **RTO & Kimre Fume Collector (RTO/RTOBP)**. This system shall meet the applicable performance specification(s) of the Division's monitoring requirements. **The temperature monitoring device shall have an accuracy of $\pm 2\%$ ($^{\circ}\text{F}$). Data shall be recorded continuously and shall be used to calculate hourly averages of the RTO1. The hourly averages shall be used to calculate the 3-hour rolling average.** [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- 5.2.2 The Permittee shall install, calibrate, maintain, and operate a device to measure the pressure drop across the filter and across the pre-filter of **RTO & Kimre Fume Collector (RTO/RTOBP)**. Once each day, or portion day, of operation, the Permittee shall read and record the pressure drop across the filter and pre-filter of the RTO & Kimre Fume Collector (RTO/RTOBP). [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- 5.2.3 The Permittee shall perform a check of visible emissions from the **RTO & Kimre Fume Collector (RTO/RTOBP)** and all baghouses (including process baghouses) controlling emissions from sources listed in Section 3.1 of this permit, and from sources added or replaced in accordance with this permit and Rule 391-3-1-.03. Emission units monitored using a COMs are exempt from this condition. Baghouses controlling emissions from silos with dedicated bin vents, wet screening operations, bucket elevators, screw conveyors, bagging operations, and pneumatic conveyors are exempt from this condition. The Permittee shall retain a record in a daily visible emissions (VE) log suitable for inspection or submittal. The check shall be conducted at least once for each day or portion of each day of operation using procedures a through d below except when scheduling, atmospheric conditions or sun positioning prevent any opportunity to perform the daily VE check. Any operational day when scheduling, atmospheric conditions or sun position prevent a daily reading shall be reported as monitor downtime in the report required by Condition 6.1.4. Scheduling prevents a daily VE check only when an emission unit is not operating during a regularly scheduled time period established for the daily VE checks. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- a. Determine, in accordance with the procedures specified in paragraph d of this condition, if visible emissions are present at the discharge point to the atmosphere from each of the sources and record the results in the daily (VE) log. For sources that exhibit visible emissions, the Permittee shall comply with paragraph b or c of this condition.

- b. For each source determined to be emitting visible emissions, the Permittee shall determine whether the emissions equal or exceed the opacity action level using the procedure specified in paragraph d of this condition, except that the person performing the determination shall have received additional training acceptable to the Division to recognize the appropriate opacity level and the determination shall cover a period of three minutes. The opacity action level is 5 percent for baghouses subject to NSPS or an avoidance limit and the opacity action level is 10 percent for all other baghouses. The results shall be recorded in the daily (VE) log. For sources that exhibit visible emissions of greater than or equal to the opacity action level, the Permittee shall comply with paragraph c of this condition.
 - c. For each source that requires action in accordance with paragraphs a or b of this condition, the Permittee shall determine the cause of the visible emissions and correct the problem in the most expedient manner possible. The Permittee shall note the cause of the visible emissions, the pressure drop, any other pertinent operating parameters, and the corrective action taken in the maintenance log.
 - d. The person performing the determination shall stand at a distance of at least 15 feet which is sufficient to provide a clear view of the plume against a contrasting background with the sun in the 140° sector at his/her back. Consistent with this requirement, the determination shall be made from a position such that the line of vision is approximately perpendicular to the plume direction. Only one plume shall be in the line of sight at any time when multiple stacks are in proximity to each other.
- 5.2.9 The Permittee shall maintain a monthly log to track compliance with the limitations in Condition 3.2.3. Records shall be available for inspection and/or submittal to the Division and contain:
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- a. The dates and length of periods of time during which asphalt coating is drawn or refilled concurrently using Asphalt Coating Storage Tanks (CTA), (CTB) and (CTC).

New Condition

- 5.2.10 The Permittee shall develop and implement a Preventive Maintenance Program (PMP) for the regenerative thermal oxidizer (ID No. RTO) in order to assure that the provisions of Condition 8.17 are met. The program shall be subject to review and, if necessary, to assure compliance, modification by the Division. At a minimum, the following operation and maintenance checks shall be made on at least an annual basis, and a record of the findings and corrective actions taken shall be kept in a maintenance log:
[391-3-1-.02(6)(b)1]
- a. Clean burner.
 - b. Tighten burner valve linkage.

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- c. Visually inspect the inlet and outlet thermocouples, have thermocouples calibrated for proper operation.
- d. Visually inspect the inlet and outlet pressure sensors, have sensors calibrated for proper operation.
- e. Visually inspect crossflow for plugging on burner side. If crossflow is dirty remove and clean with hose and water.
- f. Visually inspect chamber for cracks.
- g. Visually inspect process fan rotor for warpage, cracking, abnormal noise, and free spin.

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**Amended Conditions

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)
 - i. None required to be reported in accordance with Condition 6.1.4.
- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)
 - i. Any incident of combustion of fuels other than natural gas and propane in fuel-burning sources (Except in the Emergency Fire Pump Fire Pump (EFP)).
 - ii. Any time asphalt coating is drawn concurrently from Asphalt Coating Storage tanks (CTA) and (CTB).
- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)
 - i. Each occurrence when the temperature at the inlet of the RTO & Kimre Fume Collector (RTO & RTOBP) exceeds its filter media design temperature.
 - i. For the sources specified in Condition 5.2.3, any two consecutive required daily determinations of visible emissions for which either visible emissions are present or are above the opacity action level, whichever is applicable.
 - iii. Any instance an operational or maintenance check required by condition 5.2.4 reveals that a maintenance action level was triggered, and the maintenance was not performed according to the Preventative Maintenance Program
 - iv. Any visible emissions or mechanical failure or malfunction discovered during the walk through described in Condition 5.2.5 that are not eliminated or corrected within 24 hours of first discovering the visible emissions or mechanical failure or malfunction.

- v. Any three-hour average RTO temperature measured and recorded per Condition 5.2.1. that is below the minimum temperature established during the most recent performance test. The minimum RTO1 combustion zone temperature before the initial performance testing is 1,500°F.
- d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4:
 - i. The Permittee shall include in the semiannual reports required in Condition 6.1.4, the information mandated by the applicable requirements of paragraphs (b)(1) through (b)(4) of 40 CFR 63.11564 and Table 5 of 40 CFR 63 Subpart AAAAAAA for the Coater Emission ID (**FCC**). In the event of any deviation from a Subpart AAAAAAA emission limitation (emission limit and operating limit), the Permittee must include the information in 40 CFR 63.11564(b)(3)(i) through (b)(3)(xii) (*See* Condition 6.2.5).
[40 CFR 63. 11564(b) and Table 5 to 40 CFR 63 Subpart AAAAAAA]
 - ii. The Permittee shall include in the semiannual reports required in Condition 6.1.4, the information mandated by the applicable requirements of paragraphs (b)(1) through (b)(9) of 40 CFR 63.6650 and Table 7 of 40 CFR 63 Subpart ZZZZ for the Emergency Fire Pump (EFP). In the event of any deviations from Subpart ZZZZ operating parameters (*See* Condition 3.3.3), the report shall contain the information required per paragraph (d) of 40 CFR 63.6650.
[40 CFR 63.6650(b)(5), 40 CFR 63.6650(c), 40 CFR 63.6650(d), 40 CFR 63.6650(f) and Table 7 to 40 CFR 63 Subpart ZZZZ]

Attachments

- A. List of Standard Abbreviations and List of Permit Specific Abbreviations
- B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups
- C. List of Reference

